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May 4, 2004

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TWB-204
Washington, D.C. 20554

Re: Ex Parte Notice, ET Docket No. 00-258

Dear Secretary Dortch:

On May 3rd, Mark Esherick and Stephen Berger (via telephone call) of Siemens met with Jennifer Manner of Commissioner Abernathy's Office to discuss issues associated with the above-referenced proceeding. In particular, we provided information responding to VTECH's objections to rule changes proposed by the DECT FORUM for the Unlicensed Personal Communications Services (UPCS) frequency band. A copy of the presentation supported by the DECT Forum is attached for inclusion in the record of this proceeding.

If you have any questions, please let me know.

Sincerely,



Mark Esherick
Director of Government Relations
Siemens Corporation

Attachment

cc: Sheryl Wilkerson, Chairman Powell
Ed Thomas, Chief, OET

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Siemens Corporation

Government Affairs

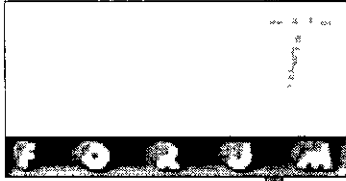
701 Pennsylvania Ave. N.W.
Suite 720
Washington, DC 20004

Tel: (202) 434-4800
Fax: (202) 347-4015

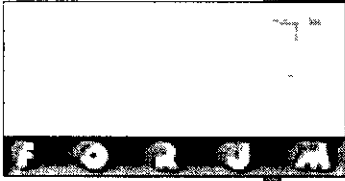
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Rationale for Optimizing the UPCS Band for Real Time Services

Presented – April 29, 2004



- Review of DECT Forum proposals
- VTech objections to Proposals
- DECT Forum responses

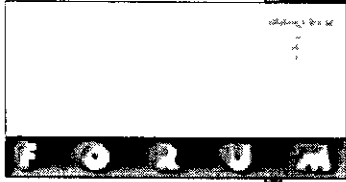


- Remove fixed channelization
- Set maximum bandwidth of 2.5 MHz
- Extend the isochronous band down to 1915 MHz
- Remove the packing rule, section 15.323 (b)

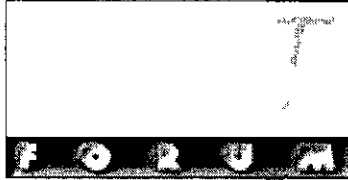
- VTech has over 25% of the cordless telephone market share and is No. 1 in both revenue and number of units sold.
- VTech asserts that these proposals add confusion with no added benefit to the consumer.
- VTech also makes DECT products for the European market.

- **VTech contends that the DECT Forum proposals would:**

- Have not had a thorough airing and will negatively impact channel availability for existing UPCS equipment.
- DECT doesn't need to use UPCS band but can operate in the ISM bands.
- False and misleading claims of higher voice quality and "protected spectrum".
- Intent of several other proposals is to increase number of UPCS channels available for voice applications.
- DECT Forum proposal would eliminate fixed channels and expand per-channel bandwidth from 1.25 to 2.5 MHz Results in 2 or 3 UPCS channels being unavailable for each DECT channel in use

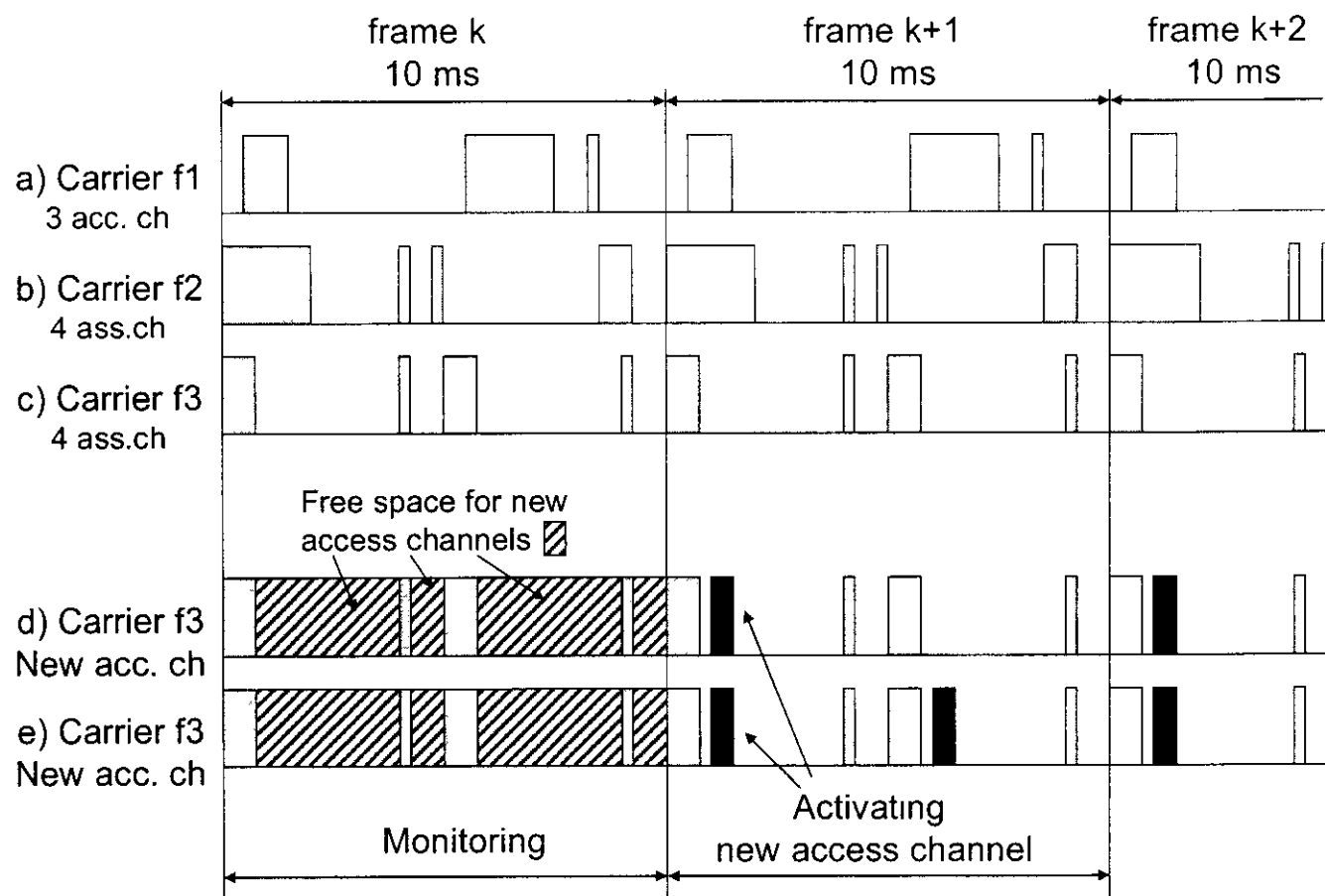


- Choice is good for the consumer.
- The proposed rule changes have been publicly aired through the FCC rulemaking process.
- The DECT Forum proposal was first submitted to UTAM and is supported by them.

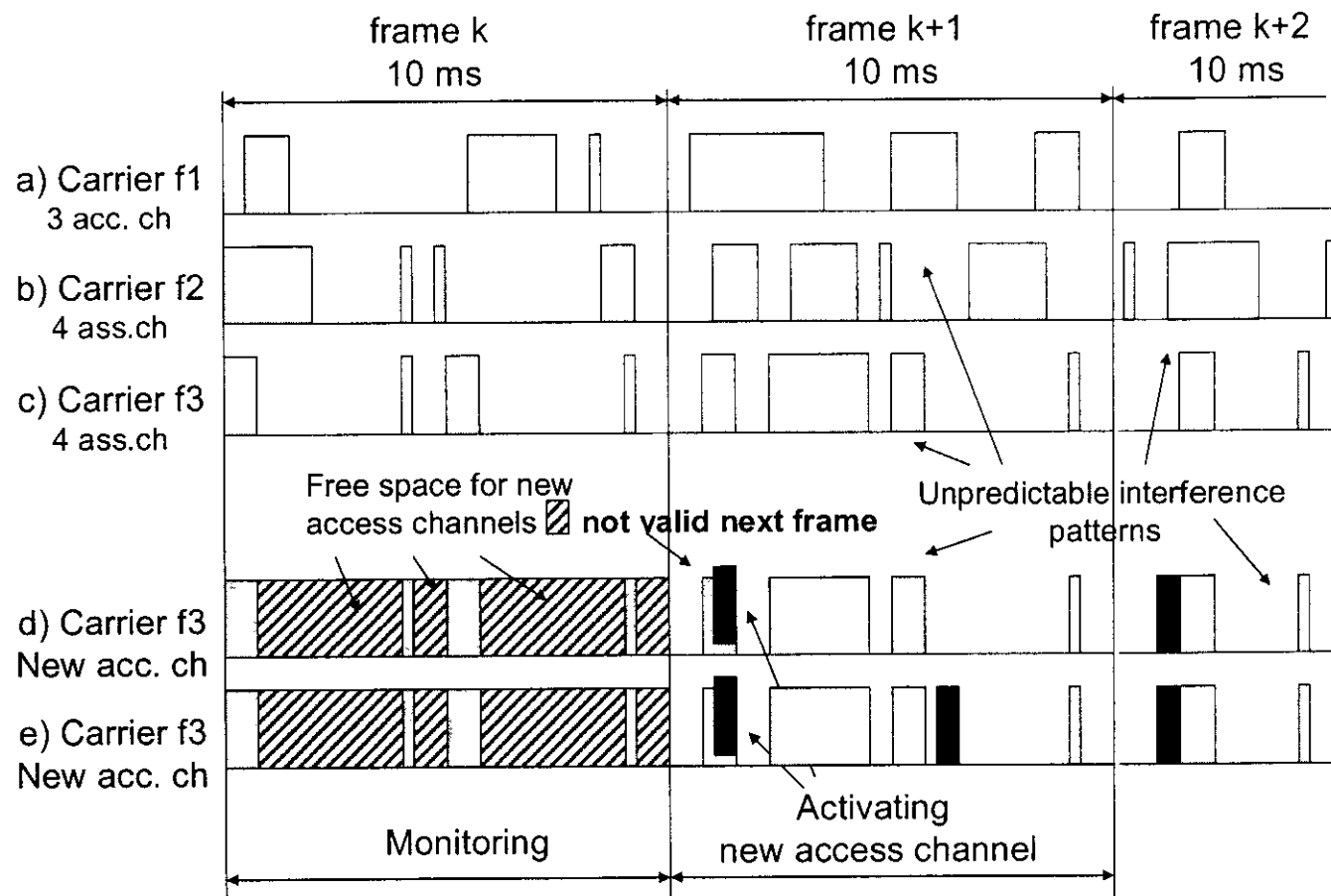


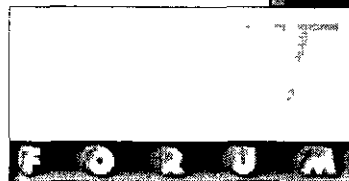
- DECT could use the ISM bands but those bands are not optimised for real time performance.
- The ISM band rules cannot assure a transmission timeslot will be free. Therefore, coordination of transmissions cannot be coordinated.

Coexistence of isochronous UPCS access channels and setting up new channel



ISM band rules - Interference patterns unpredictable for consecutive frames





- The isochronous services of the UPCS band are needed and demand for more spectrum for real time services is increasing.
- UPCS band could be a spectrum area where new voice services can operate, providing consumers with additional choices and improved value.
- Amended UPCS rules, as proposed by the DECT Forum, will accommodate present candidate technologies as well as future applications.